

Designation Run Report

Mash, Lisa - Plaintiffs' Submission

Mash, Lisa 07-28-2020

Plaintiffs Affirmative Designations 00:05:38

Total Time 00:05:38



LM01-Mash, Lisa - Plaintiffs' Submission

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27:12 - 27:20	Mash, Lisa 07-28-2020 (00:00:19) 27:12 Q. And while you were working with 27:13 the company there for 20-plus years, you were 27:14 actually one of the vice presidents of sales 27:15 and distribution, weren't you? 27:16 A. I was a vice president of sales 27:17 during that time. 27:18 Q. And how many years were you 27:19 vice president of sales? 27:20 A. Approximately 14.	LM01.1
80:14 - 80:18	Mash, Lisa 07-28-2020 (00:00:10) 80:14 Q. Well, let me ask you this then: 80:15 But you worked with the CSRA frequently, 80:16 correct? 80:17 A. About specific customers and 80:18 during training, yes.	LM01.2
81:09 - 82:18	Mash, Lisa 07-28-2020 (00:01:22) 81:9 Q. But you knew there was -- you 81:10 knew what the Oxy Express was coming from 81:11 Florida right through -- right through West 81:12 Virginia. You knew that, didn't you? 81:13 A. I had heard about it. 81:14 Q. Well, what had you heard about 81:15 it while you were working as vice president 81:16 of sales for West Virginia? What had you 81:17 heard about the Oxy Express that came right 81:18 through the state that you were in charge of 81:19 sales? What did you know about it? 81:20 A. What did I know about it? 81:21 Q. Yeah. 81:22 A. I think that's kind of a 81:23 general statement. I know that that was part 81:24 of the news media and things that they had 81:25 been showing. You know, we had discussed it 82:1 during our training, that this was an area 82:2 that we needed to be -- have a heightened 82:3 awareness of our customer base. 82:4 Q. Well, did you -- 82:5 A. I don't know what you want me 82:6 to -- I don't know what you're looking for as	LM01.3

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	82:7 far as specifics on what I knew.	
	82:8 Q. Well, what I'm looking for is	
	82:9 you knew -- you knew the interstate that	
	82:10 drove right through West Virginia was part of	
	82:11 the Oxy Express.	
	82:12 Did you know that or didn't you	
	82:13 know that while you were working as vice	
	82:14 president of sales for the state of West	
	82:15 Virginia?	
	82:16 A. It was part of our training.	
	82:17 It was part of the news media. So, yes, I	
	82:18 had heard of it. I had no specifics.	
96:12 - 96:20	Mash, Lisa 07-28-2020 (00:00:22)	LM01.4
	96:12 Q. Okay. "People are selling --	
	96:13 people are selling more prescription drugs	
	96:14 than illegal drugs like cocaine and	
	96:15 marijuana."	
	96:16 During your time, did you	
	96:17 understand that the demands for these opioid	
	96:18 drugs that physicians prescribed are	
	96:19 astronomical? Did you understand that the	
96:23 - 96:25	96:20 demand for these drugs were astronomical?	
	Mash, Lisa 07-28-2020 (00:00:05)	LM01.10
	96:23 THE WITNESS: Yeah. I mean,	
	96:24 I'm sure that that's one of the	
98:11 - 98:19	96:25 descriptors that were used.	
	Mash, Lisa 07-28-2020 (00:00:22)	LM01.5
	98:11 I'm just wondering whether you	
	98:12 asked your salespeople to try to do the same	
	98:13 thing, just to communicate with you about	
	98:14 issues.	
	98:15 A. Yes. I'm sure that during our	
	98:16 sales meetings and during our conversations	
	98:17 we were all aware of, you know, watching the	
	98:18 media and making sure that we were cognizant	
111:19 - 112:21	98:19 of any news going on in our areas.	
	Mash, Lisa 07-28-2020 (00:01:13)	LM01.6
	111:19 Q. Okay. Let me get that right,	
	111:20 because I want to be -- I want to be --	
	111:21 Ms. Mash, trust me, I'm trying to be as open	

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111:22 and fair about this as I can.
 111:23 Your position was VP of sales,
 111:24 and your -- the city that you were -- one of
 111:25 the cities you were charged with was
 112:1 Huntington; is that correct?
 112:2 A. That is correct.
 112:3 Q. All right. Now, in that
 112:4 capacity, had anybody shared with you that
 112:5 down in Huntington, which, oh, by the way, is
 112:6 about -- how far is that from Columbus?
 112:7 A. Four hours, three and a half,
 112:8 four hours.
 112:9 Q. Had anybody shared with you
 112:10 from down in Huntington that there were
 112:11 babies going through opioid withdrawal like
 112:12 we just saw in that video?
 112:13 A. No one -- as far as I can
 112:14 recall, no one referenced a specific news
 112:15 article. Again, this is something that we
 112:16 were all very aware of. It was part of our
 112:17 everyday lives. It was part of the news
 112:18 media and part of what we do for a living.
 112:19 But, no, I don't remember ever
 112:20 having somebody tell me about this specific
 112:21 article in the news.

117:25 - 119:03

Mash, Lisa 07-28-2020 (00:01:17)

LM01.7

117:25 Q. Did anybody ever describe for
 118:1 you what a pill mill looked like, where
 118:2 people might be lined up at a pill mill
 118:3 waiting to get in and get their drugs as
 118:4 early as eight o'clock in the morning? Did
 118:5 anybody ever describe anything like that to
 118:6 you and what was going on in Huntington?
 118:7 A. I don't want to say it was
 118:8 specific to Huntington. I think it was
 118:9 specific to the epidemic as a whole across
 118:10 the country.
 118:11 As part of our CSRA training,
 118:12 they wanted the field to be aware of and
 118:13 notify them if they saw certain triggers.

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	<p>118:14 And that could have been, you know, the first</p> <p>118:15 of the month having lines of people outside</p> <p>118:16 of the pharmacy to pick up a prescription.</p> <p>118:17 It could have been looking for -- you know,</p> <p>118:18 if they would go in and make their normal</p> <p>118:19 sales call and, again, having a line of</p> <p>118:20 people and seeing license plates from various</p> <p>118:21 states, more than would constitute a local</p> <p>118:22 customer base. Those were the types of</p> <p>118:23 things that we had been trained to look for.</p> <p>118:24 But we didn't have access to a</p> <p>118:25 lot of the specific data on what was going</p> <p>119:1 into the stores, so we had to look for</p> <p>119:2 anything that would overtly bring attention</p> <p>119:3 to that pharmacy from our point of view.</p>	
158:11 - 158:15	<p>Mash, Lisa 07-28-2020 (00:00:07)</p> <p>158:11 Q. But this was your territory,</p> <p>158:12 right? Oceana would have been part of your</p> <p>158:13 territory?</p> <p>158:14 A. All of West Virginia was part</p> <p>158:15 of my territory.</p>	LM01.8
161:09 - 161:16	<p>Mash, Lisa 07-28-2020 (00:00:19)</p> <p>161:9 They're talking about your</p> <p>161:10 territory there, aren't they? West Virginia,</p> <p>161:11 ground zero for the opioid epidemic in the</p> <p>161:12 United States?</p> <p>161:13 That's your territory?</p> <p>161:14 A. Yes, I was in charge of the</p> <p>161:15 drug distribution -- I was -- or sales team</p> <p>161:16 in the state of West Virginia.</p>	LM01.9

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